

Honorable J Richard Creatura

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

NATHEN BARTON,

Plaintiff  
v.

JOE DELFGAUW, XANADU  
MARKETING INC., EXPERIAN  
INFORMATION SOLUTIONS INC.,  
STARTER HOME INVESTING INC,  
JOHN DOE 1-10

Defendants.

Case No.: **3:21-cv-05610-JRC**

**ANSWER TO COUNTER-CLAIMS  
OF XANADU MARKETING, INC.,  
AND JOE DELFGAUW**

PLEASE TAKE NOTICE that Plaintiff Nathen Barton (hereinafter referred to as “Barton”) answers the Counter-Claims of Counter-Plaintiffs Joe Delfgauw (“Delfgauw”) and Xanadu Marketing Inc. (“Xanadu”).

Page 11, lines 3-5. Barton does not contest that Xanadu and Delfgauw filed counter-claims.

Page 11, lines 7-8. Barton lacks sufficient personal information to admit or deny the allegations contained in these lines.

1 Page 11, paragraph 1.1. Barton lacks sufficient personal information to admit or deny the  
2 allegations contained in this paragraph.

3 Page 11, paragraph 1.2. Barton believes this to be true.

4 Page 11, paragraph 2.1. Barton admits.

5 Page 11, paragraph 3.1. Barton denies.

6 Page 11, paragraph 3.2. Barton denies.

7 Page 12, paragraph 3.3. Barton lacks sufficient personal information to admit or deny the  
8 allegations contained in this paragraph.

9 Page 12, paragraph 3.4. Barton denies.

10 Page 12, paragraph 3.5. Barton denies.

11 Page 12, paragraph 3.6. This sentence makes no sense to Plaintiff, therefore he can  
12 neither admit or deny the allegations contained in this paragraph.

13 Page 12, paragraph 3.7. Barton denies.

14 Page 12, paragraph 3.8. Barton denies.

15 Page 12, paragraph 3.9. Barton denies.

16 Page 12, paragraph 3.10. Barton admits.

17 Page 12, paragraph 4.1. Barton does not understand the significance of this paragraph to  
18 admit or deny the claim of this paragraph.

19 Page 13, paragraph 4.2. Barton denies.

20 Page 13, paragraph 4.3. Barton denies.

21 Page 13, paragraph 4.4. Barton denies.

22 Page 13, paragraph 4.5. Barton does not understand exactly what is being communicated  
23 in this sentence, but to the extent Barton does understand, Barton denies.

Page 13, paragraph 4.6. Barton does not generally understand what is being communicated in this sentence, but to the extent Barton does understand, Barton denies.

Page 13, paragraph 4.7. Barton does not generally understand what is being communicated in this sentence, but to the extent Barton does understand, Barton denies.

Page 13, paragraph 4.8. Barton denies.

Page 13, paragraph 4.9. Barton denies.

Page 13, paragraph 4.10. Barton denies.

Page 14, paragraph 5.1. Barton does not understand the significance of this paragraph to admit or deny the claim of this paragraph.

Page 14, paragraph 5.2. Barton denies.

Page 14, paragraph 5.3. Barton denies.

Page 14, paragraph 5.4. Barton denies.

Page 14-15, paragraph 5.5. Barton denies.

Page 15, paragraph 5.6. Barton denies.

/s Nathen Barton

Nathen Barton

11/17/2021

Dated

Nathen Barton  
(718) 710 5784  
4618 NW 11<sup>th</sup> Cir  
Camas WA 98607  
FarmersBranch2014@gmail.com

# **I. CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF System, which will automatically generate a

1 Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF  
2 System, which includes the Defendant. The said Notice of Electronic Filing specifically  
3 identifies recipients of electronic notice.

4 Executed on November 17, 2021.

5 /s/ Nathen Barton

6 Nathen Barton  
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